

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, *ex rel.*)
LOUIS LONGO,) CIVIL ACTION NO. 17-1654
)
Plaintiff,)
)
v.)
)
WHEELING HOSPITAL INC., R&V)
ASSOCIATES, LTD., and RONALD L.)
VIOLI,)
)
Defendants.)

DECLARATION OF RELATOR LOUIS LONGO

I, Louis Longo, hereby declare as follows:

1. I am an adult over the age of eighteen (18) and a resident of the State of Pennsylvania.
2. The information contained in this Declaration is based on my personal knowledge. If called to testify, I would state as follows:
3. I have lived in Pittsburgh for nearly sixty (60) years and permanently reside there. I was a resident of Pittsburgh at all times relevant to the issues in my original Complaint and the Government's Complaint in Intervention.
4. I was employed as an Executive Vice President at Wheeling Hospital from November 2011 through August 2015.
5. I was offered this Executive position by Defendant Ronald Violi ("Mr. Violi")—Wheeling Hospital's CEO—during a meeting at Defendant R&V Associates Ltd.'s ("R&V") Pittsburgh office.

6. During the time relevant to the issues in my original Complaint and the Government's Complaint in Intervention, Mr. Violi regularly worked from the R&V Pittsburgh office one day a week—on Fridays.
7. While at the R&V Pittsburgh office, Mr. Violi engaged in work on behalf of Wheeling Hospital.
8. I personally met with Mr. Violi at the R&V Pittsburgh office to discuss Wheeling Hospital-related business on at least two occasions.
9. I made phone calls, or participated in phone calls that were made to Mr. Violi at R&V's Pittsburgh office.
10. I witnessed staff at Wheeling Hospital contact Mr. Violi when at the R&V Pittsburgh office.
11. I am aware that Wheeling Hospital staff often faxed documents to R&V's Pittsburgh office for Mr. Violi's review.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 16, 2019



Louis Longo, Relator